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Attorney for Defendant Imperial Pacific International (CNMI), LLC

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN MARIANA ISLANDS**

JAMES WHANG, dba SOUTH PACIFIC  
LUMBER COMPANY,

Plaintiff,

vs.

IMPERIAL PACIFIC INTERNATIONAL  
(CNMI), LLC,

Defendant.

Civil Case No. 1:21-cv-00027

**DEFENDANT'S INTITIAL  
DISCLOSURES**

COMES NOW Defendant Imperial Pacific International (CNMI), LLC ("IPI"), by and through its counsel, Joey P. San Nicolas, Esq., and hereby submits the following disclosures pursuant to Rule 26(a)(1)(A) of the Federal Rules of Civil Procedure:

1) The name and, if known, the address and telephone number of each individual likely to have discoverable information—along with the subjects of that information—that the disclosing party may use to support its claims or defenses, unless the use would be solely for impeachment:

a) Defendant, who can be contacted through counsel, is likely to have discoverable information in this case.

b) IPI Chief Executive Officer Ray N. Yumul, who can be contacted through counsel, is likely to have discoverable information in this case.

1 c) IPI Vice President Xing Tao, who can be contacted through counsel, is likely to  
2 have discoverable information in this case.

3 d) Plaintiff, who can be contacted through his counsel, is likely to have discoverable  
4 information in this case.

5 e) All persons identified in the documents that have been produced or will be  
6 produced by both Plaintiff and Defendant may have discoverable information in  
7 this case.  
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9 2) A copy—or a description by category and location—of all documents, electronically  
10 stored information, and tangible things that the disclosing party has in its possession, custody, or  
11 control and may use to support its defenses, unless the use would be solely for impeachment: All  
12 such documents of which Defendant is currently aware of are documents that are also in  
13 Plaintiff's possession. Any and all additional documents generated to support Defendant's  
14 defenses will be made available for inspection and copying promptly upon receipt.  
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16 3) A computation of each category of damages claimed by the disclosing party—who  
17 must also make available for inspection and copying as under Rule 34 the documents or other  
18 evidentiary material, unless privileged or protected from disclosure, on which each computation  
19 is based, including materials bearing on the nature and extent of injuries suffered: Not  
20 applicable.  
21

22 4) For inspection and copying as under Rule 34, any insurance agreement under which  
23 an insurance business may be liable to satisfy all or part of a possible judgment in the action or to  
24 indemnify or reimburse for payments made to satisfy the judgment: Not applicable.  
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1 Dated this 29<sup>th</sup> day of October, 2021.

2  
3 /s/ Joey P. San Nicolas

4 JOEY P. SAN NICOLAS

5 Attorney for Defendant Imperial Pacific  
6 International (CNMI), LLC  
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